

7 May 2025

Mr Liam Donsworth
Development Manager
Richmond Bridge Burra Park 2 Pty Ltd as trustee for Burra Park Prop Trust 1
UniSuper Limited as Trustee for UniSuper and UniSuper Management Pty Limited,
ISPT Pty Limited as trustee for The Industry Superannuation Property Trust No. 1,
HB&B Property Pty Ltd
Level 12
89 York St
Sydney NSW 2000

BURRAH PARK SSDA – AGENCY FEEDBACK (AVIATION)

Dear Liam,

This letter has been prepared as a covering note to responses prepared by Avlaw Aviation Consulting Pty Ltd (Avlaw) with regards feedback to aviation-related received following submission of the Burrah Park SSDA.

The scope of Avlaw's review of RFI's was limited to feedback received from the Civil Aviation Safety Authority (CASA) and Western Sydney Airport Corporation (WSA Co). Avlaw's responses to each individual comment can be found in the table annexed to this covering note.

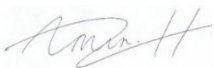
Feedback from CASA was positive and went as far as stipulating that they have no objections to either the concept plan or Stage 1 development, on the proviso that the mitigations contained in the Environmental Impact Statement (EIS) are implemented.

Feedback from WSA Co was more detailed and responses were provided against each of the applicable guidelines in the National Airports Safeguarding Framework (NASF), except for Helicopter Landing Sites (HLSs). None of the conclusions reached by Avlaw were challenged and any additional comments in relation to conditions of consent are consistent with advice contained in Avlaw's Aviation Safeguarding Assessment which supplemented the SSDA.

One comment by WSA Co related to a discrepancy in relation to runway coordinates specified in the 'Aviation Safeguarding Assessment' prepared by Avlaw. Avlaw has since confirmed the coordinates in our report were nothing more than a typographical error. This means that the modelling completed by Avlaw and subsequent conclusions in the 'Aviation Safeguarding Assessment' remain accurate and can be relied upon.

Lastly, Avlaw acknowledges comments made by WSA Co with regards to expectations in relation to inclusions in future SSDA's and accompanying Aviation Safeguarding Assessments and agrees that they are reasonable and will ensure these are addressed if/when engaged to do so.

Yours sincerely,



Amin Hamzavian
Managing Director

Annex A – Aviation Safeguarding Assessment RFIs incl. Avlaw Responses

No	WSI	Primary Responsible Consultant	Initial / Consultant Comments
1	General Aviation Safeguarding - The Building Envelopes and GFA for Superlot 2b, specifically lots 2.7c, 2.8 and 2.8b should not be approved in the current form as the compliance with the airport safeguarding provisions of the Western Parkland City SEPP cannot be adequately addressed at a concept plan level of detail. - A future, detailed SSD application, should set out the building envelopes, uses and GFA and heights in the southeastern corner (Superlot 2b).	Avlaw	Agreed
2	Aircraft Noise For any industrial development within the 30-40 ANEC appropriate conditions should be applied to ensure compliance with AS2021:2015 Acoustics Noise Intrusion - Building siting and construction development.	Avlaw	Agreed and consistent with the assessment in Section 5.1 of Avlaw's report
3	Windshear and Turbulence - Buildings that intrude in the 1:35 building height surface plane require further assessment in accordance with National Airport Safeguarding Framework (NASF), Guideline B and consultation with WSI. - Future individual development lots and individual buildings may be required to undertake detailed assessment in accordance with NASF Guideline B, which may also require CFD Modelling, particularly for future stages in the southeastern corner identified as Lot 2.7B, 2.7C and 2.8B. - Future stages are to show building envelopes/heights in 3D against the 1:35 plane to enable assessment.	Avlaw	Agreed and consistent with the assessment in Section 5.2 of Avlaw's report. Request re 3D presentation noted and will be incorporated into future documentation prepared by Avlaw.
5	Lighting - Noting the general aviation safeguarding comment above, the future lots 2.7A, 2.7B, 2.7C, 2.8A, 2.8B are located within a Lighting Intensity Zone A. Lighting is to comply with Lighting Intensity Zone Future developments must comply with the requirements under the NASF Guideline D requiring, in particular that lighting must not exceed the intensity of light 0 candela (cd) above a 3-degree horizontal. - WSI acknowledges that the application was referred to CASA by DPHI and that they provided comments in relation to lighting including: - o street/security lights are not to shine upwards and are not to have green, red or white arrays of lights.	Avlaw, C-Level	Agreed and consistent with the assessment in Section 5.4 of Avlaw's report

6	Prescribed Airspace • The southeastern corner of site is within critical airspace surfaces, including the Obstacle Limitation Surface (OLS). Whilst the maximum building heights are below OLS, the future construction of buildings may require the use of cranes or other equipment that may impact on protected airspace. • Development that impacts protected airspace requires a controlled activity approved under the Airports (Protection of Airspace) Regulation 1996. A Controlled Activity application must be submitted to WSI for assessment and consultation with relevant Commonwealth Agencies. WSI as the Airport Lessee Company (ALC) will assess the application and refer it the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination. • Protected airspace includes the OLS and PANS-OPS as well as other surfaces. It should be noted that the PANS-OPS surface is currently being prepared). It should be noted that long term intrusion into the PANS-OPS (i.e. greater than 3 months) are prohibited. this will need to be taken into consideration for the future development outcomes for the southeastern corner of the site, in particular the constructability of future development. • It should be noted that under SEPP (Precincts-Western Parkland City) 2021 Clause 4.22, development consent must not be granted to development unless the relevant Commonwealth body (e.g. WSI) supports it.	Avlaw	Agreed and consistent with the assessment in Section 5.5 of Avlaw's report. Non-conventional construction methods may need to be considered if construction will take place after WSI opens, which is currently the plan.
7		Avlaw	Avlaw confirms that the runway elevations used to inform its assessment/modelling are correct. The reference to runway 05L elevation at 75.12m AHD is a typo. Therefore, the conclusions in our report can still be relied upon, noting Airservices still need to validate these findings as the exact location of the navigation aids are not in the public domain.

	Communication and Navigation Facilities - Given the Localiser and Glidepath Building Restricted Area covers the southern portion of the site, the application was referred to the Airservices Australia. A determination of the application should not be undertaken by the consent authority until feedback is received from Airservices Australia. WSI have been advised that this can take up to six weeks (sent 21 November 2024). WSI will forward the response when received. - The Aviation Safeguarding Assessment refers to RLs of the end of the runways which do not align with the actual runway elevations. The report indicates that the end of Runway 05L is at 73.2m. The 05L runway elevation is 92.82m and the 23R elevation adjacent to the site is 75.12m. Any analysis within the ASA should be revised in reference to the correct runway elevations.																											
	<table><tr><th colspan="2">RUNWAY DATA</th><th>EASTING</th><th>NORTHING</th><th>ELEVATION</th><th>RUNWAY LENGTH</th></tr><tr><td rowspan="4">RUNWAY END POINT</td><td>05L</td><td>286914.06</td><td>6247443.79</td><td>93.82</td><td rowspan="2">3,700</td></tr><tr><td>23R</td><td>290067.11</td><td>6249379.83</td><td>75.12</td></tr><tr><td>05R</td><td>287916.77</td><td>6245829.84</td><td>84.58</td><td rowspan="2">3,700</td></tr><tr><td>23L</td><td>291069.83</td><td>6247765.88</td><td>71.65</td></tr></table>	RUNWAY DATA		EASTING	NORTHING	ELEVATION	RUNWAY LENGTH	RUNWAY END POINT	05L	286914.06	6247443.79	93.82	3,700	23R	290067.11	6249379.83	75.12	05R	287916.77	6245829.84	84.58	3,700	23L	291069.83	6247765.88	71.65		
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8	Public Safety Area Noting the general aviation safeguarding comment above, future development of Lot 2.7C should be subject to a detailed development proposal that includes building envelopes, end uses and GFA and heights to enable a detailed assessment. Specifically, lots 2.7c, 2.8 and 2.8b should not be approved in the current form as the compliance with the Clause 4.23 of the Western Parkland City SEPP cannot be adequately addressed at a concept plan level of detail.	Avlaw	Agreed and consistent with the assessment in Section 5.8 of Avlaw's report																									
13	Aircraft Noise A condition should be applied to ensure compliance with AS2021:2015 Acoustics Noise Intrusion - Building siting and construction development.	Avlaw	Agreed and consistent with the assessment in Section 5.8 of Avlaw's report																									

14	Windshear and Turbulence It is noted that the Stage 1 development area is within the assessment trigger area, however the proposed buildings are below the 1:35 building height plane. If the heights change then a further assessment under the NASF Guideline B and consultation with WSI is required.	Avlaw	Agreed and consistent with the assessment in Section 5.2 of Avlaw's report
16	Lighting - A Glint and Glare Study is to be prepared and submitted to the Department of Planning, Housing and Infrastructure and WSI to understand the cumulative impact from materials used in the building together with the solar panels across the site. This will be required to be referred to CASA. - WSI acknowledges that the application was referred to CASA by DPHI and that they provided comments in relation to lighting. - A condition of consent should be imposed that street street/security lights and construction lighting does not shine upwards and is not to have green, red or white arrays of lights - Future applications will be required to consider plume rise in accordance with CASA Advisory Circular AC139.E-02v1.0 Plume Rise Assessments. - Whilst the maximum building heights are below OLS, the future construction of buildings may require the use of cranes or other equipment that may impact on protected airspace. - Development that impacts protected airspace requires a controlled activity approved under the Airports (Protection of Airspace) Regulation 1996. A Controlled Activity application must be submitted to WSI for assessment and consultation with relevant Commonwealth Agencies. WSI as the Airport Lessee Company (ALC) will assess the application and refer it the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for determination.	Avlaw, C-Level	A Glint and Glare Assessment is outside the scope of Avlaw's engagement and capabilities. This will need to be pricured via another supplier. All other points consistent with the assessment in Avlaw's report.
17	- The following condition of consent should be imposed: If the proposed development results in impacts to protected airspace, then approval will need to be obtained in accordance with the Airports Act 1996 and the Airports (Protection of Airspace) Regulations 1996. Intrusions into prescribed airspace, could include: - constructing permanent structures, such as buildings, into the protected airspace; - temporary structures such as cranes protruding into the protected airspace; or - activities causing non-structural intrusions into the protected airspace such as air turbulence from stacks or vents, smoke, dust, steam or other gases or particular matter. A Controlled Activity application must be submitted to WSI.	Avlaw	Agreed and consistent with the assessment in Section 5.5 of Avlaw's report

18	Communication and Navigation Facilities • Given the Localiser and Glidepath Building Restricted Area covers the southern portion of the site, the application was referred to the Airservices Australia. A determination of the application should not be undertaken by the consent authority until feedback is received from Airservices Australia. WSI have been advised that this can take up to six weeks (sent 21 November 2024). WSI will forward the response when received. • The Aviation Safeguarding Assessment refers to RLs of the end of the runways which do not align with the actual runway elevations. The report indicates that the end of Runway 05L is at 73.2m. The 05L runway elevation is 92.82m and the 23R elevation adjacent to the site is 75.12m. Any analysis within the ASA should be revised in reference to the correct runway elevations.	Avlaw	Avlaw confirms that the runway elevations used to inform its assessment/modelling are correct. The reference to runway 05L elevation at 75.12m AHD is a typographical error. Therefore, the conclusions in our report can still be relied upon, noting Airservices still need to validate these findings as the exact location of the navigation aids are not in the public domain.
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No	CASA	Primary Responsible Consultant	Initial / Consultant Comments
1	CASA has no major issues with the Avlaw Aviation Safeguarding Assessment or the Wildlife Hazard Assessment by Eco Logical, and no issues with the recommendations provided in the Assessments. CASA does not object to the concept plan for Burrah Park and the development of stage 1 provided the mitigations described, are implemented.	N/A	Noted and agreed.